

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM  
ZHANG, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and  
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND  
LLC and JOHNNY HONG, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,  
DANIEL LARIMER, IAN GRIGG, and  
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

**LEAD PLAINTIFF'S NOTICE OF MOTION  
FOR EXTENSION OF TIME TO FILE APPLICATION FOR ATTORNEYS' FEES AND  
EXPENSES AND FOR COSTS AND EXPENSES OF LEAD PLAINTIFF**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Crypto Assets Opportunity Fund LLC, by and through its attorneys, hereby moves the Court, before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, to extend the time for Lead Counsel

to file an application for an award of attorneys' fees and expenses and for costs and expenses for Lead Plaintiff to Tuesday, October 19, 2021.

1. On June 23, 2021, this Court filed an Order requiring that all papers in support of the Settlement, Plan of Allocation, and any application by Lead Counsel for attorneys' fees and expenses and for costs and expenses for Lead Plaintiff be filed and served by October 17, 2021. (ECF No. 115).

2. Lead Plaintiff Crypto Assets Opportunity Fund ("Lead Plaintiff"), through Brandon Elsasser, its Chief Investment Officer, has requested that Lead Counsel move the Court for a short extension of the deadline for Lead Counsel to submit its application for an award of attorneys' fees and expenses, and Lead Plaintiff's request for an award to pursuant to 15 U.S.C. §78U-4(A)(4). Lead Plaintiff advised Lead Counsel that it requires a short period of additional time to consider the application for attorneys' fees and expenses. Accordingly, Lead Plaintiff respectfully moves that the deadline for filing these papers be extended for two days, until Tuesday, October 19, 2021.

3. This request does not affect Lead Plaintiff's Motion for Approval of the Settlement and Plan of Allocation, which has been filed today as required by the Court's June 23 Order (ECF 115).

4. Extension of the deadline to file an application for attorneys' fees and expenses and for costs and expenses for Lead Plaintiff will not prejudice the Class in any way or impact any other deadlines set by this Court.

5. Through its counsel, Lead Plaintiff consulted with Defendants, through their counsel, regarding an extension of the deadline to file an application for attorneys' fees and

expenses and costs and expenses for Lead Plaintiff. Defendants consent that this deadline be extended until October 19, 2021.

6. As such, Lead Plaintiff and Lead Counsel respectfully request that the deadline for Lead Counsel to file an application for attorneys' fees and expenses and for costs and expenses for Lead Plaintiff be extended to October 19, 2021.

DATED: New York, NY  
October 17, 2021

Respectfully submitted,

/s/ Daniel L. Berger

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*Lead Counsel for the Class and Counsel for  
Lead Plaintiff Crypto Assets Opportunity  
Fund, LLC*